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9 Attorneys for Plaintiffs  
10 OLGA SORENSEN and JAMES SORENSEN

11 GAIL C. TRABISH, ESQ. (SBN 103482)  
12 BOORNAZIAN, JENSEN & GARTHE  
13 A Professional Corporation  
14 555 12<sup>th</sup> Street, Suite 1800  
15 Oakland, CA 94607  
16 Telephone: (510) 834-4350  
17 Facsimile: (510) 839-1897

18 Attorneys for Defendant  
19 TARGET CORPORATION erroneously  
20 sued herein as "Target Corporation, dba  
21 Target #1122"

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

17 OLGA SORENSEN and JAMES ) Case No.: C12-04025 JCS  
18 SORENSEN, )  
19 Plaintiff, )  
20 vs. )  
21 TARGET CORPORATION, dba Target )  
#1122 and Does 1-20 )  
22 Defendants. )  
23 ) [San Mateo County Superior Court Case  
24 ) No.: CIV513499]  
25 \_\_\_\_\_)

26 Pursuant to Federal Rule of Civil Procedure 35, all parties to this action hereby stipulate  
27 and agree that Defendant TARGET CORPORATION shall be allowed to conduct a neurologic  
examination of plaintiff as follows:

1       1. The examination will be conducted by Bruce McCormack, M.D., a licensed and  
2 board certified neurosurgeon.

3       2. The examination will commence at **11:00 a.m. on December 18, 2013 at 2320**  
4 **Sutter Street, Suite 202, San Francisco 94115.**

5       3. Dr. McCormack's examination of plaintiff will include a physical examination and  
6 other diagnostic tests that are not painful, protracted or intrusive. No radiographic studies will be  
7 undertaken. The examination of plaintiff is to determine plaintiff's medical condition, causation,  
8 diagnosis and prognosis as it relates to the facts involved in the incident which gives rise to this  
9 lawsuit. The examination may be attended by plaintiff's representative.

10      4. Following the examination, defendant will provide plaintiff's counsel with a copy  
11 of the report of examination. By receiving this report or by deposing the examiner, plaintiff waives  
12 any privilege she may have in this action concerning testimony about all examinations with respect  
13 to the same condition, pursuant to Federal Rule of Civil Procedure 35(B)(4). Upon receipt of the  
14 Independent Medical Examination report prepared by Dr. McCormack, plaintiff's attorney will  
15 provide defense counsel with the identity of all healthcare practitioners who have or will examine  
16 plaintiff for the same condition and a copy of any reports which may exist or thereafter are  
17 prepared.

18  
19 DATED: September 12, 2013

VIOLA LAW FIRM

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21 By: /s/ Karen A. Neri

22                   LAWRENCE S. VIOLA, ESQ.

23                   KAREN A. NERI, ESQ.

24                   Attorneys for Plaintiffs

25                   OLGA SORENSEN and

26                   JAMES SORENSEN

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1 DATED: September 17, 2013

2 BOORNAZIAN, JENSEN & GARTHE  
3 A Professional Corporation

4 By: /s/ Gail C. Trabish

5 GAIL C. TRABISH, ESQ.  
6 Attorneys for Defendant  
7 TARGET CORPORATION

8 Dated: 9/18/13



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